

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

CRUZ ALEJANDRO AVENDANO

|
|
| No. 3:13-00114

|
| Judge Sharp

MOTION TO EXTEND DEADLINE FOR FILING OF WAIVER BY FORTY-EIGHT (48) HOURS

Comes now undersigned counsel and hereby respectfully moves this Honorable Court to allow him to file the speedy trial waiver approximately 1-2 days after the deadline announced by the Court in docket entry 42. For cause, counsel would state and show the following:

- (1) The Defendant, Mr. Avendano, does not speak English. He is currently being housed in the Grayson County Jail in Leitchfield, Kentucky.
- (2) Counsel had planned on visiting Mr. Avendano last weekend (September 1) but was unable to due to family illness.
- (3) Counsel had hoped to visit Mr. Avendano today, September 3, 2013, but was unable to find an interpreter on such short notice.
- (4) Based on the above difficulties, undersigned counsel has requested the U.S. Marshalls bring Mr. Avendano to Nashville on Thursday, September 5, 2013. This was the earliest counsel could schedule such a trip.